

DOCKET SECTION

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

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POSTAL RATE COMMISSION
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POSTAL RATE AND FEE CHANGES, 1997

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Docket No. R97-1

**REPLY BRIEF OF
GREETING CARD ASSOCIATION**

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OF COUNSEL:

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Dated: April 10, 1998

In this proceeding, the Greeting Card Association ("GCA") established through the testimony and survey of Dr. Ken C. Erickson that greeting cards have high cultural value to mail recipients. GCA urges the Postal Rate Commission ("Commission") to give more weight to the "cultural value" of First-Class mail and greeting cards to mail recipients and to § 3622(b)(8) in setting First-Class postal rates in this proceeding.

In response, the Postal Service has presented no testimony or evidence in contravention of these survey results and Dr. Erickson's findings. The Postal Service's approach is to minimize Dr. Erickson's testimony and dismiss anything the Postal Service itself has not undertaken. The Postal Service does not address "ECSI" or the cultural value of mail to recipients. It simply makes a conclusory statement that there is no basis to conclude that First-Class mail has more ECSI value than is already reflected in the current rate design. The Postal Service characterizes Dr. Erickson's testimony as "a compendium of cultural observations" (USPS Brief, V-38) which were a surprise only as to their extent. (USPS Brief, V-39) Dr. Erickson is stated to have said that all mail has cultural value. (USPS Brief, V-38) The Postal Service dismisses Dr. Erickson as having studied only the value associated with greeting cards and that studies could be undertaken of other parts of the mail stream to identify attributes of their cultural value. (USPS Brief, V-39)

As with its rate proposal, the Postal Service's brief pays only lip service to § 3622(b)(8) and minimizes ECSI value to recipients. Dr. Erickson's testimony is more than just mere observations. His conclusions are buttressed by a scientifically-valid survey which the Postal Service chose not to challenge in this proceeding. The survey results go straight to the heart of § 3622(b)(8) and show that greeting cards sent through the mail have a high degree of cultural value for a broad cross-section of Americans. Greeting cards have even greater cultural significance for certain segments

of the American population – African Americans, the elderly, and low-income Americans.

Furthermore, the Postal Service has mischaracterized Dr. Erickson's testimony. Dr. Erickson did not intimate that all mail has equal cultural value as the Postal Service would suggest. In answer to Postal Service interrogatories, Dr. Erickson said that "all the contents of the day's mail are part of the daily American cultural ritual involving the receipt of the mail." He then stated that "[s]ome elements within the day's mail are more dense with cultural significance than others." (Tr. 25/13228) Under oral cross-examination, Dr. Erickson said that a greeting card generally may have greater cultural value than other types of mail. (Tr. 25/13254)

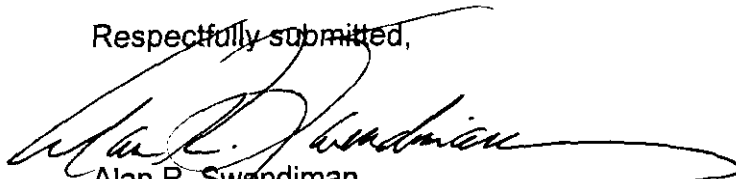
The Postal Service describes Dr. Erickson's testimony as "the novel perspective of a cultural anthropologist." (USPS Brief, V-38) Yet, the only expert competent to testify as to "cultural value" is a cultural anthropologist such as Dr. Erickson. In support of its economically reliant proposal, the Postal Service has produced a battery of economic experts who have no background or training in the field of culture and have not addressed "ECSI" but in the most superficial fashion.¹ The Postal Service demonstrates its lack of expertise in this area by characterizing Dr. Erickson's efforts as "study[ing] something, in this case greeting cards, [and] you know more afterwards." (USPS Brief, V-39) Scientists, cultural or otherwise, do study what may be considered common phenomenon. Before undertaking research, scientists form hypotheses to test their tentative conclusions. They then test those hypotheses. Prior to the survey, Dr. Erickson believed that greeting cards played a cultural role in American life. The survey

¹ In Docket No. MC95-1, Commissioner Quick challenged GCA witness Dr. James Clifton, an economist, for testifying on matters which were the domain of a cultural anthropologist or sociologist. Docket No. MC95-1, Tr. 26/12352-12353.

results show the nature of the cultural value of greeting cards and the wide extent to which that value is held by a broad cross-section of American society. The survey confirms Dr. Erickson's hypothesis to an extent he never anticipated. (Tr. 25/13236) The Postal Service dismisses Dr. Erickson's survey as failing to study the cultural value of other types of mail. That was not Dr. Erickson's intention or obligation. The Postal Service could have done so and did not.

The Postal Service's lack of cultural expertise and testimony demonstrates why Dr. Erickson's testimony is particularly important in this proceeding. The Commission should utilize that testimony to give greater weight to the "cultural value" of First-Class mail and greeting cards to recipients under § 3622(b)(8) in setting First-Class postal rates in this case.

Respectfully submitted,



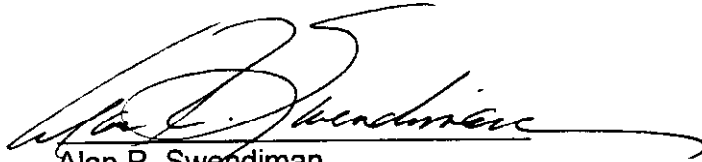
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April 10, 1998

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding on this date in accordance with § 12 of the Rules of Practice and Procedure.

A handwritten signature in black ink, appearing to read "Alan R. Swendiman", with a long horizontal flourish extending to the right.

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